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Formation

May 5, 2010

Ms. Eva DeMaria
US EPA Region 10
Office of Compliance and Enforcement
NPDES Compliance Unit
1200 6th Avenue, Suite 900, OCE-133
Seattle, WA 98101

Re: NPDES Quality Assurance Project Plan for the Idaho Cobalt Project (Permit No. ID-002832-1)

Dear Ms. DeMaria:

Enclosed please find one electronic copy of the NPDES Quality Assurance Project Plan for the Idaho Cobalt Project (ICP) on CD-ROM. Copies of this plan are also being transmitted to DEQ, NMFS, and USFWS under separate cover. Hardcopies can be sent upon specific request. Also enclosed with this letter, are responses to EPA comments received on April 6, 2010.

If you have any questions, or comments, please do not hesitate to contact me at 208-756-4578, ext 24 or by email at prufe@formcap.com.

Respectfully submitted,

Preston Rufe
Environmental Manager

Formation Responses to EPA Review Comments and Questions for:

Telesto Solutions, Inc. February 2010. NPDES Quality Assurance Project Plan for the Idaho Cobalt Project.

General Comments

The QAPP format and content conforms to EPA guidance documents as specified in the NPDES permit.

Specific Comments and Questions

Several sections are included repetitively for each sample type. The following comments refer to the first occurrence of text. However, when text is repeated in subsequent sections for other sample types, the comment applies to the repeated sections as well.

1. Section 1.7.2, page 12. The list of data package contents does not include raw instrument data and sample preparation logs. These will be needed to conduct full validation (i.e., check calculations and confirm sample preparation procedures and dates for holding time determinations) as specified in the national functional guidelines that are cited in the QAPP. Even if laboratory calculations will not be checked routinely, full data packages should be provided by the laboratories to allow thorough evaluation of any unusual results and to provide a defensible data package.

Formation Response:
Data are retained by the laboratory for five years. If we encounter any unusual results, we will contact the laboratory to obtain those data for review.

2. Section 2.1.2, page 14. Please provide additional detail about the automated sampling system that will be used to collect a 24-hour composite sample from Outfall 001, including the sampler that will be used and a summary of how the compositing will be achieved. If this level of detail is still under development, this may be stated in the QAPP and details should be included in the discharge monitoring reports. If a detailed description is provided in another document, that document should be cited in the QAPP.

Formation Response:
This automated sampling equipment is still under evaluation and when equipment is identified and installed, we will update the QAPP.

3. Section 2.3.1 and 2.3.2, pages 23 and 25. Full validation per CLP functional guidelines should be completed on the first package for each analysis and at regular intervals, e.g., one package every 6 months or every year for each laboratory method.

Formation Response:
Data are retained by the laboratory for five years. If we encounter any unusual results, we will contact the laboratory to obtain those data for review.

4. Section 4.1.3, page 45. The first paragraph on this page indicates that fish will be frozen prior to shipment, but then will be shipped on ice. If shipment is to occur shortly after the fish are collected, the fish should not be frozen to avoid loss of fluids as they thaw during shipment. Alternatively, fish can be frozen and packed with dry ice for shipment.

Formation Response:
We will update the QAPP to indicate that fish samples will be frozen and shipped with dry ice.

5. Section 4.1.4, page 49. Fish tissue samples may be stored frozen at -15 °C for a period of up to 1 year for methylmercury. See *Appendix to Method 1631, Total Mercury in Tissue, Sludge, Sediment, and Soil by Acid Digestion and BrCl Oxidation* (EPA-821-R-01-013, January 2001).

Formation Response:
We will update the QAPP to identify the holding time for frozen fish tissue samples

6. Table 6 provides laboratory methods and detection limits for fish tissue. A similar table for effluent and surface water is needed. It is not clear which methods will be used for metals and conventional analytes, and whether the methods will be sensitive enough to meet permit requirements.

Formation Response:
The permit requires MDLS but does not specify the methods to attain MDLs. The QAPP lists the MDLs as specified in the permit. Formation and its laboratory will identify and utilize methods to meet permit requirements.

7. Section 4.1.5, pages 49 and 50. "Field" QC for fish tissue should include a homogenization blank, i.e., an equipment blank generated at the laboratory to check on decontamination of the sample homogenization equipment. Analytical precision will be determined by using laboratory duplicates. An additional check on precision by analysis of separate fillets of a single fish is not necessary.

Formation Response:
The QAPP has been updated to include the laboratory homogenization blank and to remove the duplicate filet analysis.